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16 Attorneys for Plaintiff

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19 District of Nevada
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25 Attorneys for Defendant

26
17 UNITED STATES DISTRICT COURT

18 DISTRICT OF NEVADA

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20 TINISHA PRICE)
21 v. Plaintiff,) Case No. 2:17-cv-00755-JCM-VCF
22 NANCY A. BERRYHILL,)
23 Acting Commissioner of Social Security,) JOINT STIPULATION FOR EXTENSION OF
24 Defendant.) TIME TO FILE DEFENDANT'S NOTICE OF
VOLUNTARY REMAND OF THE CASE OR
CROSS-MOTION TO AFFIRM
() (Second Request)

1 IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that
2 the time for responding to Plaintiff's Motion for Summary Judgment be extended for approximately
3 two weeks from August 31, 2017 to September 15, 2017. This is Defendant's second request for
4 extension. Good cause exists to grant Defendant's request for extension. Additional time is required
5 as Counsel for Defendant (Counsel) has over 50+ active matters, of which two dispositive motions per
6 week until the early October. Counsel has been on intermittent medical leave due to her chronic
7 migraines and daily recurrent headaches. As a result of unanticipated medical leave, Counsel became
8 behind on her caseload. As such, Counsel respectfully requests additional time in order to address the
9 issues raised in Plaintiff's Motion. Defendant makes this request in good faith with no intention to
10 unduly delay the proceedings. Plaintiff has no objection to the requested relief.

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1 The parties further stipulate that the Court's Scheduling Order shall be modified accordingly.
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Respectfully submitted,

4 Date: August 29, 2017
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By: /s/ Cyrus Safa
CYRUS SAFA
*by email authorization on 8/29/17
Attorney for Plaintiff

7 Date: August 29, 2017
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STEVEN W. MYHRE
Acting United States Attorney

10 By:/s/ Tina L. Naicker
11 TINA L. NAICKER
Special Assistant United States Attorney
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IT IS SO ORDERED.

14 DATE: August 29, 2017
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17 THE HONORABLE CAM FERENBACH
18 United States Magistrate Judge
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CERTIFICATE OF SERVICE

I, TINA L. NAICKER, certify that the following individual was served with a copy of the

**3 JOINT STIPULATION FOR EXTENSION OF TIME TO FILE DEFENDANT'S NOTICE OF
4 VOLUNTARY REMAND OF THE CASE OR CROSS-MOTION TO AFFIRM**

on the date and via the method of service identified below:

CM/ECF:

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Respectfully submitted this 29th day of August 2017,

/s/ Tina L. Naicker
TINA L. NAICKER
Special Assistant United States Attorney